

Freddy Luna, #85803054

FCI Lompoc, 3600 Guard Road Lompoc, CA 93436
Defendant/ In Propria Persona

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, *

Plaintiff, * Case No. 18CR490-001 (PAC)

v. *

FREDDY LUNA, *

Defendant *

REQUEST FOR APPOINTMENT OF COUNSEL FOR
FILING A MOTION FOR COMPASSIONATE RELEASE
PURSUANT TO 18 U.S.C. 3582 (c)(1)(A)

Freddy Luna, filing pro se, Defendant, respectfully requests this Court to appoint an attorney for the purpose of filing a motion for compassionate release pursuant to 18 U.S.C. 3582 (c)(1)(A). The Defendant had previously been represented (at his expense) by Meredith S. Heller, Esq., an attorney located in New York City.

Mr. Luna, after repeated attempts to contact Ms. Heller, finally received notice of her inability to do so. Mr. Luna is unable to afford the services of an attorney, with the hope Ms. Heller would do so "pro bono." Mr. Luna's 30 months of incarceration has placed him in a situation of indigent status to afford an attorney.

Ms. Heller's response (see Exhibit A) provides insight to the fact that due to reasons other than financial that she is unable to represent Mr. Luna.

Mr. Luna, after a lengthy incarceration at the Metropolitan Detention Center, was transferred to FCI Lompoc, one of the most COVID-19 impacted facilities

in the Bureau of Prisons (BOP). Mr. Luna, remains to this day as a COVID-19 negative inmate. The immediacy of Mr. Luna's situation related to becoming infected requires professional assistance in the filing of the above-mentioned motion. (See Exhibit B.)

With the above facts and exhibits in mind, Freddy Luna respectfully requests appointment by this Court of an attorney to assist in the filing of an expedited motion for compassionate release.

Respectfully submitted,

[Signature]
Freddy Luna, Defendant

CERTIFICATE OF SERVICE

I, Freddy Luna, hereby certify that I have served a true and correct copy of:

Request for Appointment of Counsel for Filing a Motion of Compassionate Release Pursuant to 18 U.S.C. 3582(d)(1)(A) to the following listed party by placing a complete copy of the above described materials in an envelope affixed with the appropriate pre-paid first-class United States postage using the Legal Mail process at FCI Lompoc:

Clerk of the Court

U.S. District Court, Southern District of New York
c/o Honorable Judge Crotty
Moynihan U.S. Courthouse
500 Pearl St.

New York, NY 10007-1312

mailed on this the day of December 2020.

Respectfully submitted:

[Signature]
Freddy Luna, #85803054
FCI Lompoc
3600 Guard Road
Lompoc, CA 93436

1/19/2021

On Duty counsel, Ms. Jill Shellow,
will be appointed, nunc pro tunc,
1/19/2021. SO ORDERED.

[Signature]